

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed March 10, 2004 ("*Office Action*"). Claims 1-10 were pending in the Application and stand rejected. Applicant amends independent Claims 1 and 6 and adds new Claims 11-18, which are fully supported by the specification as originally filed. Applicant respectfully requests reconsideration and favorable action in this case.

Information Disclosure Statement

The Examiner has not notified Applicant that the Information Disclosure Statement ("IDS") filed on 2/11/2004 has been considered. Applicant respectfully requests the Examiner to review the IDS and provide Applicant with notice of such consideration as required by M.P.E.P. §609.

Claim Rejections - 35 U.S.C. §102

The Examiner rejects Claims 1-10 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,542,912, which issued to Meltzer ("*Meltzer*"). To anticipate a claim, a single prior art reference must describe, either expressly or inherently, each and every element of the claim. M.P.E.P. §2131.

Applicant's independent Claim 1, as amended, recites:

A method for facilitating creation of a definition for automated data processing, comprising the steps of:

providing a set of predetermined function definitions which are different, at least one of said predetermined function definitions defining a function for manipulating image data; and

preparing a project definition expressed in a public communication protocol, said project definition defining a project for manipulating said image data according to said one predetermined function definition and including:

a plurality of function portions which each correspond to one of said function definitions in said set, and which each define at least one input port and at least one output port that are functionally related according to the corresponding function definition;

a further portion which includes a source portion identifying a data source and defining an output port through

which data from the data source can be produced, and which includes a destination portion identifying a data destination and defining an input port through which data can be supplied to the data destination; and

binding information which includes binding definitions that each associate a respective said input port with one of said output ports.

Applicant respectfully submits that *Meltzer* fails to disclose every element of this Claim. In general, *Meltzer* discloses a system for businesses to exchange information related to commercial transactions. More particularly, *Meltzer* discloses using XML-based documents to exchange bids, purchase orders, and invoices.

Among other aspects of Claim 1, *Meltzer* fails to disclose “at least one of said predetermined function definitions defining a function for manipulating image data.” Neither does *Meltzer* show a “project definition defining a project for manipulating said image data according to said one predetermined function definition.”

Furthermore, *Meltzer* fails to disclose “a source portion identifying a data source and defining an output port through which data from the data source can be produced” and “a destination portion identifying a data destination and defining an input port through which data can be supplied to the data destination.” As teaching these elements, the Examiner refers to *Meltzer*’s discussion of an “issuer” and a “counter party.” *Office Action*, pages 2-3. *Meltzer* refers to an “offeror” and a counter party as parties to a business transaction, where each party is “represented by a pointer to a document conforming to the market participant DTD outlined above.” *Meltzer*, Col. 12, lines 8-47. However, while the market participant DTD “groups business information about market participants,” *id.*, Col. 11, lines 43-46, neither the parties nor the documents conforming to the market participant DTDs define “an output port through which data from the data source can be produced” or “an input port through which data can be supplied to the data destination.”

For at least these reasons, Applicant respectfully requests the Examiner to reconsider the rejection of independent Claim 1. For analogous reasons, Applicant requests the Examiner to reconsider the rejection of independent Claim 6. Claims 2-5 and 7-10 depend from Claims 1 and 6 respectively. Thus, for at least the same reasons discussed above, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of Claims 1-10.

Applicant's dependent claims further highlight deficiencies in *Meltzer*. For example, Claim 3 recites:

A method according to Claim 1, wherein one of said function definitions implements a function which varies in dependence on control input; and wherein said preparing step includes the step of including in said project definition, for each said function portion therein that corresponds to said one of said function definitions, respective control information for use as said control input.

As teaching "control input," the Examiner refers to "the format of the input document" and quotes two sentences from *Meltzer* explaining that, using a business interface definition, a company promises to do business with another company that submits a document that conforms to the specification detailed in the business interface definition. *Meltzer*, Col. 19, lines 40-64. However, promising to do business with another company if that company submits a particularly formatted document in no way shows "a function which varies in dependence on control input."

For at least these reasons, Applicant respectfully requests the Examiner to reconsider the rejection of Claim 3. For analogous reasons, Applicant requests the Examiner to reconsider the rejection of Claim 8. Claims 4 and 5 and 9 and 10 depend from Claims 3 and 8 respectively. Thus, for at least the same reasons discussed above, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of Claims 3-5 and 8-10.

New Claims

Applicant respectfully submits that new Claims 11-18, which each depend from either Claim 3 or 8, incorporate various additional elements allowable over *Meltzer*. For example, Claims 11 and 15 recite that "said function blurs an image and said control information selects between a plurality of blurring techniques." Claims 12 and 16 recite that "said function expands an image and said control information selects between a plurality of colors to fill resulting added area." Claims 13 and 17 recite that "said function performs at least one mathematical computation using said image data and said control information selects between a plurality of mathematical equations." Claims 14 and 18 recite that "said function cooperates with a separate image processing application to perform an operation using said

separate image processing application.” Applicant respectfully submits that *Meltzer* fails to disclose any of these concepts. Thus, Applicant requests allowance of these Claims.

Conclusions

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

The Commissioner is hereby authorized to charge any other fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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